

# MEMO ENDORSED

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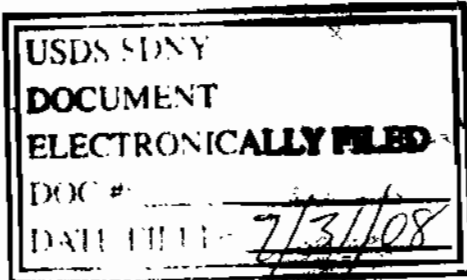
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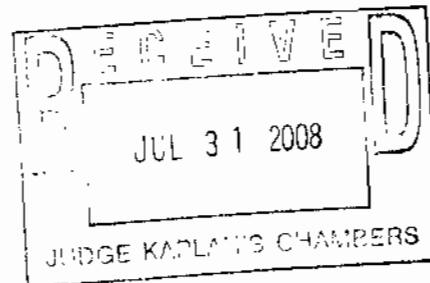
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July 30, 2008



### VIA FEDERAL EXPRESS

Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: Hughes, et al v. Getronics Wang LLC, et al  
07-CV-10356 (LAK)

Dear Judge Kaplan:

This firm represents the Defendants in connection with the above referenced matter. Pursuant to a Scheduling Order dated April 11, 2008, discovery is presently scheduled to conclude on August 15, 2008. Based on the parties' conference before Magistrate Judge Katz on July 21, during which Judge Katz clarified Defendants' preliminary discovery obligations, we write to request a sixty day extension of the discovery deadline until October 15. Plaintiff's counsel indicated at the conference that it would not oppose Defendants' request for an extension if it became necessary to request one.

This request is being made to permit adequate time for Defendants to compile and complete production of various documents Judge Katz directed Defendants to produce. Although Judge Katz directed Defendants to produce a far more limited universe of documents than that which Plaintiff was seeking, it is nonetheless a significant production involving various sites throughout the country. Additional time will allow Defendants to satisfy their discovery obligations, as well as to allow the parties time to seek judicial intervention to resolve any remaining discovery disputes and to take depositions. Moreover, Felice Ekelman, the partner supervising this case, is on vacation from August 6 through August 15.

In connection with this request, Defendants would also request that expert disclosures be extended until September 15 and that service of summary judgment motions and the filing of a pretrial order be extended until November 15. No previous request for an extension of the discovery deadline has been made.

**jackson lewis**  
Attorneys at Law

Honorable Lewis A. Kaplan

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Thank you for your consideration of this extension request.

Very truly yours,

JACKSON LEWIS LLP

David S. Greenhaus

DSG/laf/bc

cc: Ossai Miazad, Esq. (via email)

Rex Burch (via email)

*Granted*  
*No further extensions*  
SO ORDERED  
*Lewis A. Kaplan*  
LEWIS A. KAPLAN, USDJ  
*7/31/08*